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Turner, Fred G. Weiss, Nesli Basgoz, M.D.,  
and Christopher J. Coughlin*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG  
PRICING SECURITIES LITIGATION

Civil Action No. 2:16-cv-09449 (KSH) (CLW)

**JOINT STIPULATION AND ORDER  
REGARDING CLASS CERTIFICATION  
BRIEFING SCHEDULE**

Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG (“Plaintiffs”) and Defendants Allergan PLC, Brenton L. Saunders, Paul M. Bisaro, Maria Teresa Hilado, R. Todd Joyce, Sigurdur O. Olafsson, David A. Buchen, James H. Bloem, Christopher W. Bodine, Tamar

D. Howson, John A. King, Ph.D., Catherine M. Klema, Jiri Michal, Jack Michelson, Patrick J. O'Sullivan, Ronald R. Taylor, Andrew L. Turner, Fred G. Weiss, Nesli Basgoz, M.D., and Christopher J. Coughlin ("Defendants") respectfully submit this stipulation and proposed order requesting an amendment to the class certification briefing deadlines set in the Court's Order Regarding Amendment to Pretrial Scheduling Order in the above captioned action (Dkt. 142):

WHEREAS, the Court entered the initial Pretrial Scheduling Order in this Action on October 21, 2019 (Dkt. 134);

WHEREAS, the Court entered the Parties' Joint Stipulation and Order Regarding Amended to Pretrial Scheduling Order on March 11, 2020, which granted the Parties' request for a one-week extension of Plaintiffs' deadline to file their Motion for Class Certification and an eleven-week extension of all discovery deadlines (Dkt. 142);

WHEREAS, Plaintiffs filed a Motion for Class Certification on March 20, 2020 (Dkt. 143);

WHEREAS, Defendants requested an eight-week extension of the remaining briefing schedule on Plaintiffs' Motion for Class Certification to ensure Defendants have adequate time to complete discovery related to Plaintiffs' Motion for Class Certification in light of the anticipated delays arising out of the COVID-19 pandemic, and Plaintiffs consent to Defendants' request; and

WHEREAS, the Court conducted a telephonic status conference with the Parties on April 9, 2020, during which the requested modification to the remaining briefing schedule on Plaintiffs' Motion For Class Certification was discussed;

**NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:**

1. The Parties respectfully request that the deadlines set forth in the Order Regarding Amendment to Pretrial Scheduling Order be modified as follows:

<u>Event</u>	<u>Current Date</u>	<u>Revised Date</u>
Opposition to Motion for Class Certification	June 5, 2020	July 31, 2020
Reply in Support of Motion for Class Certification	July 24, 2020	September 18, 2020

Respectfully Submitted,

**CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.**

Dated: April 10, 2020

s/ James E. Cecchi

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*Attorneys for Defendants*

**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

Dated: April 13, 2020

*//s Cathy L. Waldor*

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HON. CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE